

REMARKS

The office action of September 23, 2004, has been reviewed and its contents carefully noted. Reconsideration of this case, as amended, is requested. Claims 1 through 67 remain in this case.

Preliminary Comments

The numbered paragraphs below correspond to the numbered paragraphs in the Office Action.

Claims 18 and 51 were amended to correct a typographical error ("to" a sender instead of --from-- a sender). This was an obvious typo - communications are sent *from* a sender *to* a recipient - and no new matter is introduced.

Rejection(s) under 35 U.S.C. §102

2. Claims 1-6, 12-17, 20, 21, 23, 24, 26, 27, 29-39, 45-50, 53, 54, 56, 57, 59, 60, and 62-67 were rejected under 35 U.S.C. 102(e) as being anticipated by Tsuei U.S. Patent 6,654,779.

Applicant respectfully disagrees with this rejection.

The independent claims 1 and 33 recite the Applicant's claimed method as:

1. A method of indirectly forwarding a communication from a sender to a recipient where an old address for the recipient is known or believed to be temporarily or permanently invalid, by **sending the communication to a forwarding service** at an address different from that of the recipient, **comprising, at the forwarding service, the steps of:**

a) **receiving the communication;**

b) looking up at least the old address in a database;

c) retrieving at least one second address from the database, which second address is associated with the old address;

d) **sending the communication to the second address.**

33. (Original) A method of sending a communication to a recipient when an old address for the recipient is known or believed to be temporarily or permanently invalid, comprising the step of **sending the communication to a forwarding service** at an address different from that of the recipient.

36. (Original) The method of claim 33, further comprising the steps of:

- a) **the forwarding service receiving the communication;**
- b) the forwarding service looking up at least the old address in a database;
- c) the forwarding service retrieving at least one second address from the database, which second address is associated with the old address;
- d) **the forwarding service sending the communication to the second address.**

In contrast, Tsuei has the sending ISP send **only the first e-mail address** to an E-mail Address Management System (EAMS) (figure 4, 445). The EAMS looks up the address (450) and **responds with a second e-mail address** (462). The sender's ISP then sends the new address to the sender (465), and readdresses and resends the undeliverable message to the second address (470). In an alternate embodiment, Tsuei's EAMS sends the new address to the Sender, directly, and the Sender then readdresses and resends the message. **Tsuei's EAMS never handles the message ("the communication") itself.**

Thus, instead of having a "forwarding service" which receives and forwards the communication, as claimed in the present application, Tsuei just has an address lookup service.

The present claims pertain to **the communication as a whole**, e.g. an e-mail message, and **not simply the recipient's address**. The communication is forwarded by the forwarding service rather than being returned to the sender or sender's ISP for reprocessing. Using the Applicant's invention, the communication is simply forwarded to the recipient at the second address, in one step and without necessarily revealing the updated address to the sender. In

addition to increased efficiency, this method can maintain the privacy of the recipient's new address.

3. In making the rejection, the Examiner stated "Regarding claims 1,33, and 36, Tsuei discloses a method of indirectly forwarding a communication from a sender to a recipient where an old address for the recipient is known or believed to be temporarily or permanently invalid, by sending the communication to a forwarding service at an address different from that of the recipient (Abstract), comprising, at the forwarding service (eg. figure 3, EAMS), the steps of: receiving the communication (Figure 4, EAMS receive message from send ISP 445); looking up at least the old address in a database (Figure 4, EAMS perform lookup 450); retrieving at least one second address from the database, which second address is associated with the old address (Figures 3 and 4, EAMS retrieve the new address based on old email address, 342, and 344); sending the communication to the second address (Figure 4, EAMS forward message to the new email address 470)."

Applicant believes that this mischaracterizes Tsuei in several important aspects:

- a. "...by sending the communication to a forwarding service ..." - *Tsuei does not send the message to a "forwarding service" as the term is used in the present application. - as noted above, the EAMS, by its very name, is an "address management system", not a forwarding service.*
- b. "...receiving the communication (Figure 4, EAMS receive message from send ISP 445);..." - *The EAMS does not receive the message from the ISP. Step 445 clearly says, "Sender ISP routes address query to EAMS". The Address Query is not "the communication" as the term is used in the Applicant's claim - that is, the communication which is to be forwarded - rather it is a separate message comprising a query about the recipient's address.*
- c. "... (Figure 4, EAMS forward message to the new email address 470)..." - *Step 470 states "Sender ISP forwards message to new ISP". The sender ISP does the forwarding, not the EAMS. The EAMS does not forward the message to the new*

address - this is what makes the Applicant's forwarding service a "forwarding service" and the EAMS merely an "address management service".

Since Tsuei lacks the key element of Applicant's claims - a forwarding service which receives the communication, looks up the address, retrieves the new address, and forwards the communication - Applicant believes that the Tsuei reference does not anticipate his invention claimed in claims 1 and 33, and these claims are thus patentable over the cited patent. Claim 36, being dependent upon claim 33, should also be allowable. Reconsideration and withdrawal of the rejection is respectfully requested.

4. "Regarding claims 2 and 35, Tsuei discloses in which the old address is sent to the forwarding service as part of the forwarding address (Figure 4)."

Being dependent upon allowable claims 1 and 33, respectively, claims 2 and 35 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, in Tsuei the old address is not sent "as part of the forwarding address" - the old address is what is sent to the EAMS, which responds with the new address. Reconsideration and withdrawal of the rejection is respectfully requested.

5. "Regarding claims 3 and 37, Tsuei discloses the old address is a part of the communication, and further comprising the step, after step a, of extracting (inherently) the old address from the communication (Figure 4; col. 9, lines 59-64)"

Being dependent upon allowable claims 1 and 33, respectively, claims 3 and 37 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant respectfully disagrees with the characterization of Tsuei in this paragraph - Fig. 4 and col. 9, lines 59-64 make it clear that all the sending ISP sends to the EAMS is *an address query*. The sending ISP never sends the communication to the EAMS, so the EAMS cannot extract an address from it. Reconsideration and withdrawal of the rejection is respectfully requested.

6 "Regarding claim 4, Tsuei discloses the old address for the recipient is selected from a group comprising: ..."

Inherently, any e-mail system will use e-mail addresses. However, being dependent upon allowable claim 1, claims 4 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claim. Reconsideration and withdrawal of the rejection is respectfully requested.

7. "Regarding claims 5 and 38, Tsuei discloses the second address (eg. new email address) is..."

Inherently, any e-mail system will use e-mail addresses. However, being dependent upon allowable claims 1 and 33, respectively, claims 5 and 38 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

8. "Regarding claims 6 and 39, Tsuei discloses the communication is..."

Inherently, any e-mail system will use e-mail communications. However, being dependent upon allowable claims 1 and 33, respectively, claims 6 and 39 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

9. "Regarding claims 12 and 45, Tsuei discloses there is more than one second address associated with the old address, and step d is performed for more than one of the second addresses associated with the old address (col. 7, last paragraph through col. 8, 1st paragraph)."

Being dependent upon allowable claims 1 and 33, respectively, claims 12 and 45 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant respectfully disagrees with Examiner's statement in paragraph 9 - the cited text in Tsuei neither teaches nor suggests that there can be multiple second e-mail addresses. The cited paragraph is about how the sender can query the EAMS to get "a new address", so that the message need not be forwarded at all, but can be sent with a correct address in the first place.

Reconsideration and withdrawal of the rejection is respectfully requested.

10. "Regarding claims 13 and 46, Tsuei discloses if there is a password in the database..."

Claim 13 reads:

13. (Original) The method of claim 1, further comprising the steps of:

if there is a password in the database associated with the new address,
prior to forwarding the communication **requesting a password
from the sender;**

receiving a password supplied by the sender;

comparing the password supplied by the sender to the password in the
database; and

only performing the sending step d if the comparison is successful.

Password protection of databases, as such, is known. However, as can be seen, the use of the password claimed in claims 13 and 46 is different than in Tsuei - Tsuei uses the authentication to *verify the authorization of a party (customer or ISP) to make entries into the database*. The password protection claimed in claims 13 and 46 requires *requesting and verifying a password from the sender before forwarding a communication*. Since Tsuei's EAMS does not forward communications, the EAMS cannot request a password prior to the forwarding step it does not perform.

In any case, being dependent upon allowable claims 1 and 33, respectively, claims 13 and 46 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

11. "Regarding claims 14 and 47, Tsuei discloses sending a communication to the sender with identifying material associated with the more than one second addresses retrieved in step c and requesting the sender to choose from among the more than one second addresses, accepting a choice from the sender selecting at least one of the more than one second addresses, sending the communication to the selected at least one of the more than one second addresses (col. 7, lines 31-52)."

Being dependent upon allowable claims 1 and 33, respectively, claims 14 and 44 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant respectfully disagrees with Examiner's statement in paragraph 11 - the cited text in Tsuei neither teaches nor suggests that there can be multiple second e-mail addresses. The cited paragraph is about how the sender can query the EAMS to get "a new address", so that the message need not be forwarded at all, but can be sent with a correct address in the first place. Reconsideration and withdrawal of the rejection is respectfully requested.

12. "Regarding claims 15 and 48, Tsuei discloses the at least one second address was registered by the recipient (Figure 5)."

Being dependent upon allowable claims 1 and 33, respectively, claims 15 and 48 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

13. "Regarding claims 16,17,49, and 50, Tsuei discloses the recipient periodically updates the at least one second address, and periodic updating is done automatically (col. 6, lines 30-44)."

The cited section of Tsuei refers to the original registration of a change of address with the EAMS. No periodic updating or automatic updating is described or suggested by Tsuei. In addition, being dependent upon allowable claims 1 and 33, respectively, claims 16, 17 and 49, 50, should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

14. "Regarding claims 20 and 53, Tsuei discloses at least one second address was retrieved by the forwarding service from a source other than the recipient (Figure 4)."

Being dependent upon allowable claims 1 and 33, respectively, claims 20 and 53 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant respectfully disagrees with Examiner's statement in paragraph 14 - even assuming that the EAM is a "forwarding service" (which Applicant does not believe), figure

4 of Tsuei says nothing about where the second addresses in the database come from.

Reconsideration and withdrawal of the rejection is respectfully requested.

15. "Regarding claims 21 and 54, Tsuei discloses the forwarding step (d) further comprises the step of including additional information in the communication (Figure 3; and col. 6, last paragraph through col. 7, 1st paragraph)."

Being dependent upon allowable claims 1 and 33, respectively, claims 21 and 54 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant respectfully disagrees with the Examiner's statement for the following reasons: first, the EAMS *does not receive or forward the communication, so by definition it cannot include any information in a forwarded communication*; and, second, the cited paragraph is discussing *additional information which may be stored in the EAMS database, not information in the communication*, so Tsuei neither teaches nor suggests including any additional information in a forwarded communication. Reconsideration and withdrawal of the rejection is respectfully requested.

16. "Regarding claims 23,24,55 and 57, Tsuei discloses the step of sending a confirming communication back to the sender, and the confirming communication comprises at least the second address to which the communication was forwarded (col. 7, lines 41-46)."

Being dependent upon allowable claims 1 and 33, respectively, claims 23, 24 and 55, 57 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

17. "Regarding claims 26 and 59, Tsuei discloses the old address and at least one second address are addresses in the same medium of communications (Abstract)."

Being dependent upon allowable claims 1 and 33, respectively, claims 26 and 59 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

18. "Regarding claims 27 and 60, Tsuei discloses in which the old address and at least one second address are addresses in different media of communications (Figure 3, 340)."

Being dependent upon allowable claims 1 and 33, respectively, claims 27 and 60 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant disagrees with Examiner's statement in paragraph 18 - Tsuei does not disclose different media of communication for the addresses. Tsuei's invention is an "e-mail address management system" (EAMS). By its very nature, both old and new addresses are in the same media - e-mail. Fig. 3 (340) shows this clearly - the old address is "username@oldisp.com", the new address is "username@newisp.com". Both are in the same media. Reconsideration and withdrawal of the rejection is respectfully requested.

19. "Regarding claims 29 and 62, Tsuei discloses if the seconde retrieved in step c is invalid, of using the second address as an old address, and repeating the method from step b (Figure 4, 470 to 420 to 440)."

Being dependent upon allowable claims 1 and 33, respectively, claims 29 and 62 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, Applicant disagrees with Examiner's statement in paragraph 19 - claim 29 states:

29. (Original) The method of claim 1, if the second address retrieved in step c is invalid, of using the second address as an old address, and repeating the method from step b.

Step "c" of claim 1 is the step of looking up the new (second) address in the database, which is done by the forwarding service in Applicant's invention. Clearly, claim 29 (and parallel claim 62) require that if the forwarding service *in the lookup step* finds that the second address is invalid, the method is repeated *from step b* (which is the step of looking up the old address in the forwarding service).

In Tsuei's method, shown in figure 4 and cited by the Examiner, (assuming for the sake of argument that the EAMS is a "forwarding service", which Applicant does not believe) there is no such checking for an invalid address *by the EAMS*, and repeating the lookup using the invalid address *by the EAMS*. Rather, following Tsuei's steps 470 to 420 to 440 it can be seen that the EAMS returns whatever address it finds to the sending ISP, valid or not. The sending ISP sends

the message again using the address from the EAMS, and if the new address bounces, the sending ISP sends a new address query to the EAMS, starting the whole process over again.

Reconsideration and withdrawal of the rejection is respectfully requested.

20. "Regarding claims 30 and 63, Tsuei discloses the communication is sent to the forwarding service by a server to which the communication was sent by the sender (Figure 4)."

Being dependent upon allowable claims 1 and 33, respectively, claims 30 and 63 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Reconsideration and withdrawal of the rejection is respectfully requested.

21. "Regarding claims 31 and 64, Tsuei discloses the server is associated with the sender, and the mail server automatically sends the communication to the forwarding service when the communication is returned as undeliverable (Figure 4, 440)."

Being dependent upon allowable claims 1 and 33, respectively, claims 31 and 64 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, as discussed above, Tsuei does not send *the communication* to the EAMS, but simply an *address query*, and the EAMS is not a forwarding service. Reconsideration and withdrawal of the rejection is respectfully requested.

22. "Regarding claim 32 and 65, Tsuei discloses the server is a mail server associated with the old address associated with the recipient, and the mail server automatically sends the communication to the forwarding service when the mail server cannot deliver the communication to the old address (Figures 3 and 4)."

Being dependent upon allowable claims 1 and 33, respectively, claims 32 and 65 should also be allowable for the reasons discussed above, as well as for the elements introduced by the claims. Further, figures 3 and 4 do not show the *recipient's* ISP initiating the EAMS lookup after it cannot deliver a message, but rather the Tsuei system has the recipient's ISP bounce the message and the *sender's* ISP communicates with the EAMS. And, as noted above, the EAMS is not a forwarding service. Reconsideration and withdrawal of the rejection is respectfully requested.

23. "Regarding claims 66 and 67..."

Claims 66 and 67 read:

66. (Original) A method of forwarding communications from a sender to a recipient over a network where the recipient has an address which is dynamically assigned, comprising the steps of:

- a) maintaining a database having a plurality of entries, each entry representing a session during which the recipient was connected and storing at least the address dynamically assigned while the recipient was connected and the time during which the recipient was connected using that address;
- b) when a recipient connects, creating an entry in the database and linking the currently assigned address to an entry in the database for a previous connection;
- c) accepting a forwarding request from a sender, comprising at least an address and a time representing a previous connection associated with the recipient;
- d) using the address and time from step c, finding the entry in the database which represents the previous connection;
- e) returning the currently assigned address for the recipient which was linked to the entry found in step d.

67. (Original) The method of claim 66, further comprising the step of:

- f) connecting the communication to the recipient.

These claims apply to a method of maintaining connections in a system where addresses are dynamically assigned to users as they connect to a network. In the e-mail forwarding system as in the preceding claims, the recipient's address is a constant, which has changed because the

user has moved or the like, and the user registers a new address to which mail should be forwarded. In the system claimed in claims 66 and 67, as explained in the present application, pages 21-26, the recipient's address is not a fixed, known quantity, but rather is dynamically assigned as the user connects, and may change each time the user reconnects, so that the user's address is typically not known to him. When the "sender" is connected to the "recipient", it knows the recipient's address at that moment, and the present time, but this may have changed before the next communication from the sender to the recipient. The system claimed in these claims uses the last known dynamically-assigned address for the recipient and the time at which it was known to find out the current dynamically-assigned address. This is neither shown nor suggested in Tsuei.

The Examiner states, in making the rejection, that "Tsuei discloses maintaining a database having a plurality of entries (Figure 3, 340), each entry representing a session during which the recipient was connected and storing at least the address dynamically assigned while the recipient was connected and the time during which the recipient was connected using that address, when a recipient connects, creating an entry in the database and linking the currently assigned address to an entry in the database for a previous connection (col. 6, lines 30-44); accepting a forwarding request from a sender, comprising at least an address and a time representing a previous connection associated with the recipient (Figure 4, EAMS perform lookup 450); using the address and time finding the entry in the database which represents the previous connection (Figures 3 and 4, EAMS retrieve the new address based on old email address, 342, and 344); returning the currently assigned address for the recipient which was linked to the entry found, and connecting the communication to the recipient (Figure 4, EAMS forward message to the new email address 470)."

Applicant believes that this mischaracterizes Tsuei in several important aspects:

- a. "...each entry representing a session during which the recipient was connected and storing at least the address dynamically assigned while the recipient was connected..." - Tsuei's database is a static database of e-mail addresses, not dynamic addresses representing connected sessions.

- b. "... when a recipient connects, creating an entry in the database and linking the currently assigned address to an entry in the database for a previous connection (col. 6, lines 30-44);..." - Tsuei neither teaches nor suggests any communications in "a network where the recipient has an address which is dynamically assigned". There is nothing in Tsuei about a currently assigned address, or a previously assigned address in the context of *dynamically assigned addresses in a network*. The cited section in Tsuei has to do with an e-mail user registering a change of address with EAMS, an entirely different concept.
- c. "...accepting a forwarding request from a sender, comprising at least an address and a time representing a previous connection associated with the recipient (Figure 4, EAMS perform lookup 450); using the address and time finding the entry in the database which represents the previous connection (Figures 3 and 4, EAMS retrieve the new address based on old email address, 342, and 344);..." - Step 450 comprises matching *an old e-mail address* and *a new e-mail address*. The EAMS accepts *an address request* from the sender's ISP, *not a forwarding request* comprising at least an address *and a time representing a previous connection* associated with the recipient. Tsuei neither teaches nor suggests looking up a new address based on *a dynamically assigned address and a time from a previous connection*.
- d. "...returning the currently assigned address for the recipient which was linked to the entry found, and connecting the communication to the recipient (Figure 4, EAMS forward message to the new email address 470)." - Tsuei does not return *a currently assigned dynamic address for a connected user, and connect a sender to a recipient*. Tsuei is an *e-mail address management system*. E-mail addresses are not dynamically assigned as users connect to a network. Further, the EAMS does not forward messages, and does not (claim 67) connect communications.

Since Tsuei lacks the key element of Applicant's claims 66 and 67 - a forwarding service *over a network where the recipient has an address which is dynamically assigned* then Tsuei

does not render claims 66-67 not novel. Reconsideration and withdrawal of the rejection is respectfully requested.

Therefore, it is respectfully suggested that the rejection of independent claims 1, 33 and 67 as being anticipated by Tsuei is overcome. The dependent claims, being dependent upon and further limiting independent claims 1, 33 and 66, should also be allowable for that reason, as well as for the additional recitations they contain. Reconsideration and withdrawal of the rejections are respectfully requested.

Rejection(s) under 35 U.S.C. §103

25. Claims 7-11,18-19,28,40-44,51-52, and 61 were rejected under 35 U.S.C. 103(a) as being unpatentable over Tsuei in view of Fuisz U.S. Patent 6,643,688.

Applicant does not believe that Tsuei teaches or suggests the invention claimed in independent claims 1 and 33, and the claims dependent upon those claims, for the reasons discussed above. The previous argument relative to the section 102 rejection over Tsuei is therefore repeated here by reference.

Fuisz is an e-mail redirector or forwarder, commonly known as an "anonymous remailer". In Fuisz system, the user sets up a user account, and any mail sent to that account is automatically forwarded to one or more other accounts based on filters.

It is not necessary to speculate as to what the combination of Tsuei and Fuisz would produce, as Tsuei already includes a forwarder of the general type represented by Fuisz - see figure 3, "Mail Forwarder" (114). If you replace element (114) in figure 3 with Fuisz, there is effectively no change in Tsuei's system, except that element (114) would have more than one line connecting it to (130) "Internet". The operation of the system would be the same, in that if a message sent by Fuisz's remailer to one of the accounts bounces, the remailer would send an address query to the EAMS, and if the old account is in the database, would receive a new address message from the EAMS, and it would then re-send the message to the new address.

The combination of Tsuei and Fuisz, then, would be the EAMS of Tsuei, used by the remailer of Fuisz, and would not be the forwarding service of the present application.

As neither Tsuei nor Fuisz teaches or suggests Applicant's system of forwarding messages by a forwarding service as described in the claims, the combination of the two cannot teach it or make it obvious. Reconsideration and withdrawal of the rejection is respectfully requested.

29. Claims 22,25,55, and 58, rejected under 35 U.S.C. 103(a) as being unpatentable over Tsuei.

In making this rejection, the Examiner stated "Tsuei discloses sending the communication to the second address further comprises the step of including additional information in the communication, and send the confirmation to the sender; however, Tsuei fails to teach additional information is advertising, the confirming communication also comprises additional information at least in the form of advertising."

As to the rejection of claims 22 and 55, as stated in response to paragraph 15, above, the EAMS *does not receive or forward the communication, so by definition it cannot include any additional information in a forwarded communication*, so Tsuei neither teaches nor suggests including any additional information in a forwarded communication. If Tsuei does not forward the communication, and does not add additional information (which, by definition, it cannot), then it cannot make the content of any such information obvious.

As to the rejection of claims 25 and 58, these claims are dependent upon claims 22 and 55, respectfully, and must be read in combination with the limitations of those claims - that is, what the Applicant's system is confirming is *the forwarding of the communication by the forwarding service*. Claims 25 and 58 add that additional information can be included in the message to the sender confirming the forwarding of the communication to the recipient. Since Tsuei's EAMS *does not receive or forward the communication, by definition it cannot confirm any such forwarding, and thus cannot include any information in the confirming message*. Therefore Tsuei neither teaches nor suggests nor makes obvious including any additional information in a confirming message about a forwarded communication.

Reconsideration and withdrawal of the rejection is respectfully requested.

Conclusion

Applicant believes the claims, as amended, are patentable over the prior art, and that this case is now in condition for allowance of all claims therein. Such action is thus respectfully requested. If the Examiner disagrees, or believes for any other reason that direct contact with Applicants' attorney would advance the prosecution of the case to finality, he is invited to telephone the undersigned at the number given below.

"Recognizing that Internet communications are not secured, I hereby authorize the PTO to communicate with me concerning any subject matter of this application by electronic mail. I understand that a copy of these communications will be made of record in the application file."

Respectfully Submitted:
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